

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

:
CYNTHIA RUSSO, LISA :
BULLARD, RICARDO : Civil No. 17-cv-2246
GONZALES, INTERNATIONAL :
BROTHERHOOD OF ELECTRICAL :
WORKERS LOCAL 38 HEALTH :
AND WELFARE FUND, :
INTERNATIONAL UNION :
OF OPERATING ENGINEERS :
LOCAL 295-295C WELFARE :
FUND, AND STEAMFITTERS :
FUND LOCAL 439, on :
Behalf of Themselves :
and All Others Similarly :
Situated, :
:
Plaintiffs, :
:
v. :
:
WALGREEN CO., :
:
Defendant. :
_____:

Friday, August 11, 2023

Deposition of LYNETTE HILTON, Ph.D.,
taken virtually via Zoom, with the witness
participating the offices of Econ ONE, 550 South
Hope Street, Suite 800, Los Angeles, California,
beginning at 9:03 a.m. PDT, before Ryan K. Black,
Registered Professional Reporter, Certified
Livenote Reporter and Notary Public in and for
the Commonwealth of Pennsylvania.

1 I understand correctly. Your opinion is that,
2 according to the data, you can use the data to
3 know, a hundred percent sure, whether something
4 should be included in the class or excluded in
5 the class, correct?

6 A. Based on Walgreens' testimony, I can
7 determine, based on their data, to the best of
8 Walgreens' ability, whether it's federally funded
9 or state-funded.

10 I will add that it's also Walgreens'
11 testimony that the PBMs will know for certain,
12 and I am assuming that we will be getting PBM
13 data in the future.

14 Q. Well, are you intending to rely on
15 Walgreens' data or PBM data?

16 A. I'm intending to rely on whichever
17 data I have available to me. Currently, I have
18 Walgreens' data available to me. In the future
19 if I get additional data, additional information,
20 I will incorporate that data into my analysis, as
21 well.

22 Q. And you talked about the CastiaRx data,
23 Paragraph 18.

24 MR. ALEXANDER: Counsel, are you
25 referring to Exhibit 575?

C E R T I F I C A T E

I do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this
14th day of August, 2023



Notary Public